

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE:)
TERRORIST ATTACKS ON) Civil Action No. 03 MDL 1570 (GBD)(SN)
SEPTEMBER 11, 2001) ECF Case
_____)

MOTION TO FILE RESPONSE LETTER OUT OF TIME

Undersigned Counsel, Martin McMahon, requests that the Court allow his firm to file the response letter to the Plaintiffs' Executive Committees' ("PEC") May 1, 2018 letter (ECF No. 3988) one day late (filing today, May 9, 2018). Counsel's representative, who is representing him in connection with the sanctions that the PEC has asked the Court to impose on Mr. McMahon, contacted PEC attorney Robert Haefele to ask for consent to this motion, but she has not received a response as of the time of the filing of this motion. Mr. McMahon asks for the one-day extension because of the time involved in obtaining the letter from Mr. McMahon's counsel, which is attached to and incorporated into Mr. McMahon's response letter.

WHEREFORE, Undersigned Counsel respectfully requests that this Court grant this Motion to File Response Letter Out of Time and permit the filing of his response letter to ECF No. 3988 today.

Respectfully submitted,

/s Martin McMahon
Martin F. McMahon, Esq.
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Washington, D.C. 20036
(202) 862 - 4343

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PROPOSED ORDER

Upon consideration of Attorney Martin McMahon's Motion to File Response Letter Out of Time, the Court hereby acknowledges that he will be filing his response letter to the PEC's May 1, 2018 letter, today, and accepts that response for filing. Accordingly, it is this _____ day of _____, 2018,

ORDERED that the Motion to File Response Letter Out of Time be granted for good cause shown, and hereby is GRANTED.

UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of the foregoing Motion to File Response Letter Out of Time and proposed order has been made through the Court's electronic transmission facilities and emailed to all relevant parties on the 9th day of May, 2018.

Respectfully Submitted,

/s Martin McMahon
Martin F. McMahon, Esq.